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December 9, 2009

Ms. Lynne S. Stella
Assistant Director,
Environmental Engineering Services
General Growth Properties, Inc.
110 N. Wacker Drive
Chicago, IL 60606

Subject: **Groundwater Monitoring Wells Investigation, Sampling and Capping**
The Boulevard Mall
3528 South Maryland Parkway
Las Vegas, NV 89109

Dear Ms. Stella:

TRC Solutions, Inc. (TRC) was contacted by Boulevard Associates on November 11, 2009 to investigate, sample and cap three groundwater monitoring wells located at The Boulevard Mall, Las Vegas, Nevada. This letter report describes the environmental work conducted and summarizes the results of the groundwater monitoring effort.

SITE LOCATION

The Boulevard Mall is a mall property located at 3528 South Maryland Parkway, Las Vegas, Nevada, within Section 14, Township 21 South, Range 61 East of Mount Diablo Base and Meridian. The Boulevard Mall is a 1.2 million square feet shopping center on Maryland Parkway between Desert Inn Road and Twain Avenue, north of the McCarran International Airport and east of Las Vegas Boulevard. The location of The Boulevard Mall is shown on Figure 1.

GROUNDWATER MONITORING WELL INVESTIGATION AND CAPPING

On November 13, 2009, TRC staff located and surveyed the conditions of three groundwater monitoring wells located in the west parking area of The Boulevard Mall (Mall) along Maryland Parkway. TRC has no information as to when the wells were

installed, why, or by whom. Because the wells were unmarked and well logs were not available, the wells were re-labeled as EMW-1, EMW-2 and EMW-3 to facilitate the groundwater sampling process. The well locations are shown on Figure 2.

All three wells were found to be in fair condition. The wells had been completed with flush-mount, traffic-rated well covers and 4-inch diameter rigid polyvinyl chloride (PVC) well casings.

The wells were cleaned out and capped with locking Torquer caps. Well EMW-1 was slightly buried/paved over during past construction work and TRC removed a small amount of asphalt to uncover the well. Once uncovered, the well casing was trimmed to fit the locking cap. All three wells had been previously uncapped/locked.

GROUNDWATER MONITORING WELL SAMPLING

Static fluid levels and total depths of the wells were measured prior to purging and collecting groundwater samples. Wells EMW-1 and EMW-3 were found to be dry; groundwater was measured at 20.67 feet-below-ground surface (ft-bgs) in Well EMW-2. The total depths measured in wells EMW-1, EMW-2 and EMW-3 were 16.58 ft-bgs, 24.47 ft-bgs, and 17 ft-bgs, respectively.

Because the standing water in a well may not represent in-situ ground-water quality, stagnant water is typically purged from the well prior to sample collection. TRC staff purged and sampled Well EMW-2 based on the conventional three-well casing volume purge method as outlined in the “Resource Conservation and Recovery Act (RCRA) Ground-Water Monitoring: Draft Technical Guidance,” published by the Office of Solid Waste, United States Environmental Protection Agency(USEPA), in November 1992. Well EMW-2 was purged using a disposable polyethylene bailer and the well was purged dry after three gallons of stagnant well water were evacuated. One groundwater sample was collected immediately after the well had recharged.

The groundwater sample collected was emplaced into three pre-cleaned, hydrochloric acid preserved, volatile organic analysis (VOA) vials. The three VOA vials were labeled as sample “EMW-2”, placed in an opaque, iced cooler and delivered under chain-of-custody to Veritas Laboratory, a Nevada-certified laboratory for analysis. The sample collected was analyzed for volatile organic compounds (VOCs) per USEPA Method 8260B.

Field parameters including pH, specific conductivity, temperature, dissolved oxygen and oxidation reduction potential of the groundwater were monitored and measured during sample collection. The field measurements are shown on Table 1.

FIELD OBSERVATION AND ANALYTUCAL LABORATORY RESULTS

VOCs were not detected in the groundwater samples collected from Well EMW-2. Laboratory quality control data and laboratory method blank test show that the analysis run was completed within acceptable industry standard. A summary of the analysis is shown on Table 1. The analytical laboratory report is included in Attachment 1 of this report.

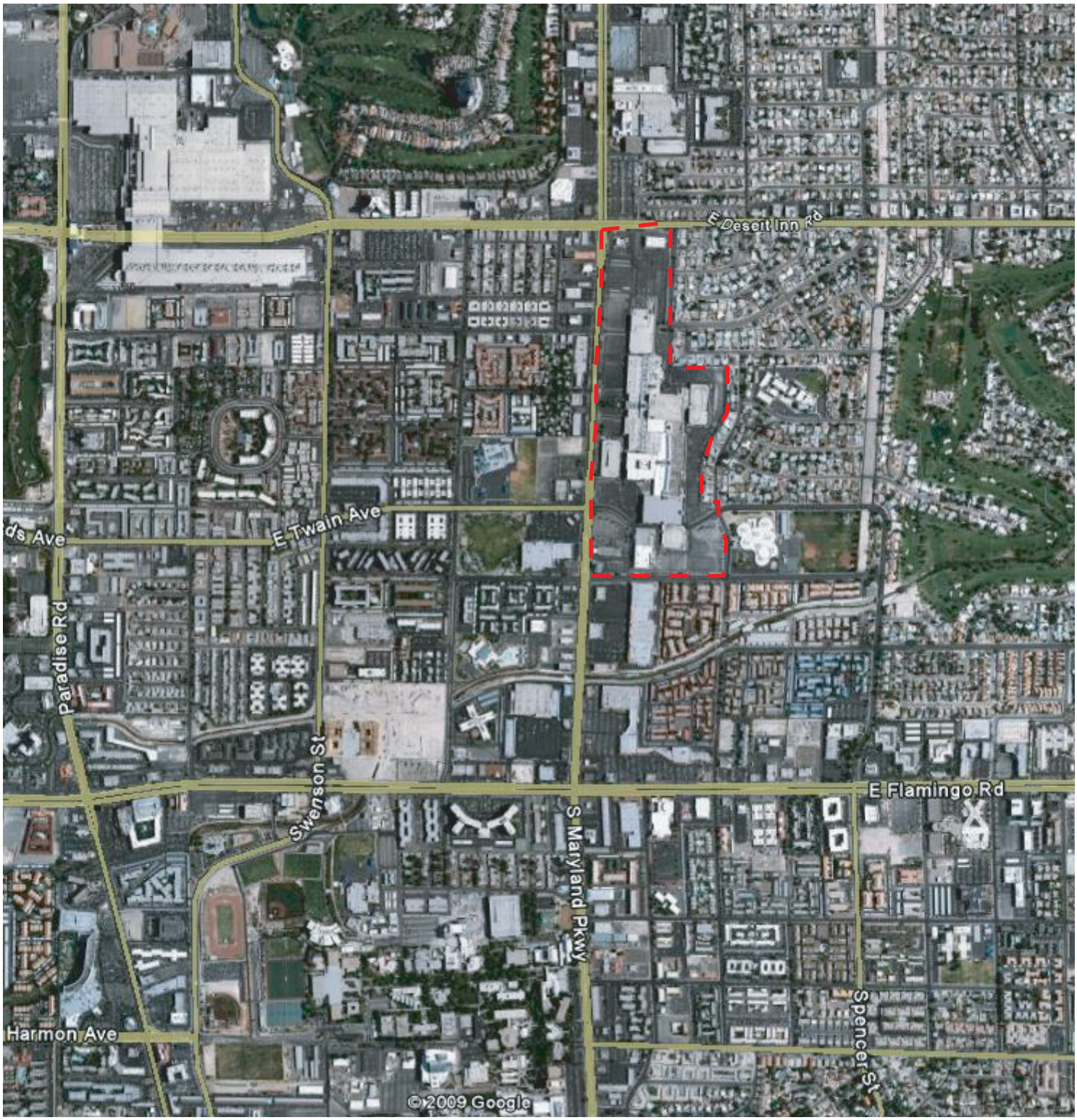
Respectfully submitted,

Yun Wang, PE, CEM
Project Manager
CEM #2125, Exp. 10/18/2011

ENVIRONMENTAL CERTIFICATION JURAT

Jurat: I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.

Enclosures

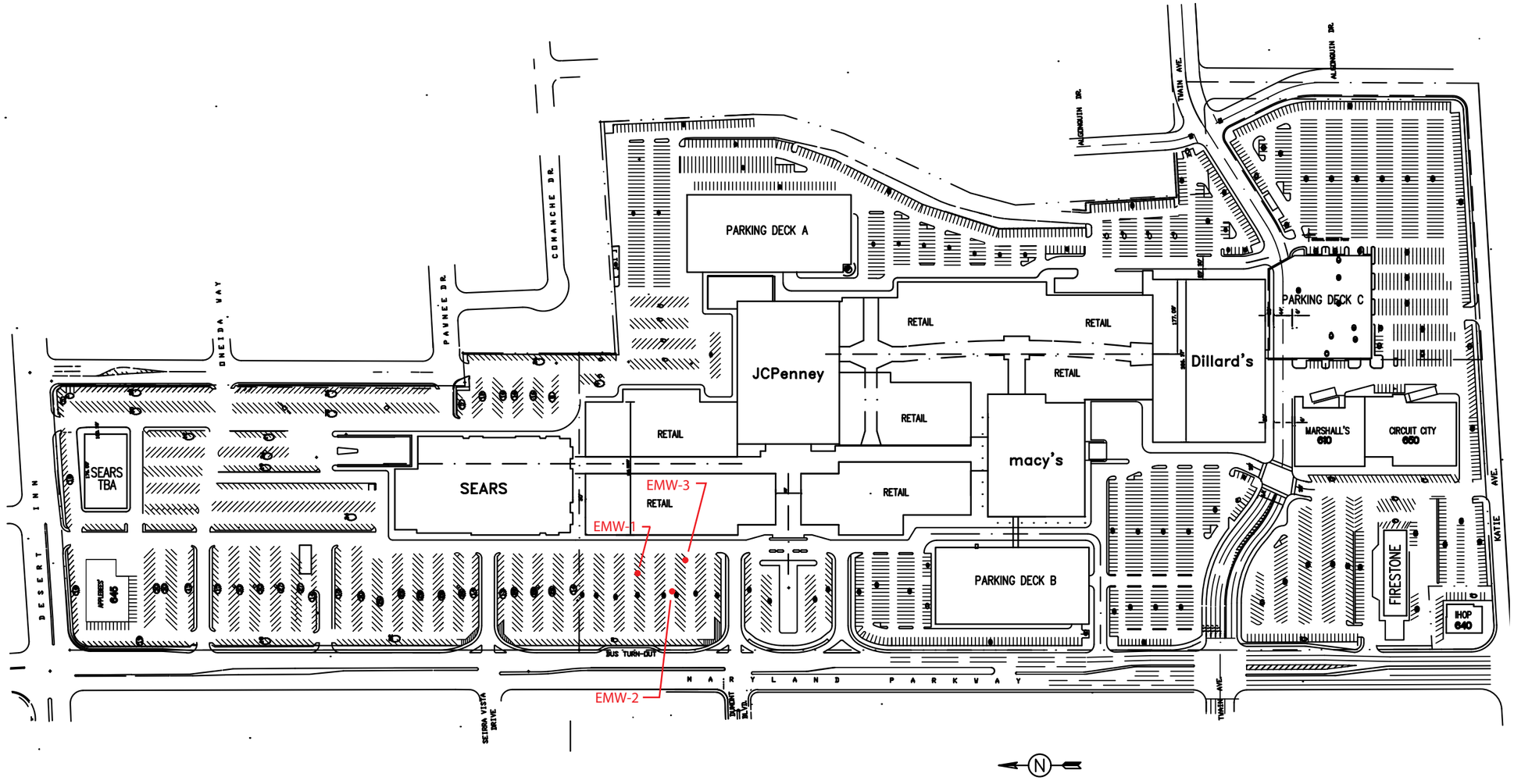


TRC

Figure 1: Site Location Map
The Boulevard Mall
3528 South Maryland Parkway
Las Vegas, NV 89109

Property Boundary

Date : 12/08/2009
Project Number: 173006



TRC

Figure 2: Groundwater Monitoring Wells Location Map
The Boulevard Mall
3528 South Maryland Parkway
Las Vegas, NV 89109

Explanation:

EMW-3 — Well Designation

Well Location

Date : 12/08/2009
Project Number: 173006

Table 1: Groundwater Quality, The Boulevard Mall, Las Vegas, Nevada (November 2009).

Well Designation	Volatile Organic Compounds (USEPA Method 8260B)				Field Parameters					Fluid Levels and Total Depth of Well	
	Tetrachloroethene (PCE) (ug/L)	Trichloroethene (TCE) (ug/L)	Vinyl Chloride (ug/L)	All Others (ug/L)	pH	Specific Conductivity (uS/cm)	Temperature (^{o}C)	Dissolved Oxygen (mg/l)	Oxidation Reduction Potential (mV)	Total Depth (ft-bgs)	Depth to Water (ft-bgs)
EMW-1	NS	NS	NS	NS	NS	NS	NS	NS	NS	16.58	Dry
EMW-2	ND (5)	ND (5)	ND (5)	ND (5)	7.03	3630	13.5	0.2	249	24.47	20.67
EMW-3	NS	NS	NS	NS	NS	NS	NS	NS	NS	17.00	Dry

Notes:

NS - Not sampled; well was dry.
ND (5) - Not detected at reporting limit indicated.
ft-bgs - feet below ground surface
uS/cm - MicroSiemens per centimeter
^{o}C - Degree Celsius
mg/l - milligrams per liter
mV - millivolts

ATTACHMENT 1
GROUNDWATER QUALITY MONITORING
LABORATORY ANALYTICAL REPORT

Veritas Laboratories
Truth in Quality, Truth in Service
6245 Harrison Drive, Suite 4, Las Vegas, NV 89120
(702) 321-8315 Phone
(702) 597-2098 Fax
Email: veritaslabs@msn.com

CLIENT NAME: TRC Solutions
8395 West Sunset Rd., Suite 190
Las Vegas, NV 89113
PROJECT MGR: Jo Wang

CLIENT PROJECT NAME: **GGP-Boulevard Mall**
CLIENT PROJECT NUMBER: 173006
VERITAS LAB ORDER ID: V0911030
DATE RECEIVED AT LAB: 11/13/09

Presented herein are the analytical results for samples received from the above referenced project.

Samples submitted for this project were not sampled by Veritas Laboratories. Unless otherwise noted, samples were received by Veritas Laboratories under a chain of custody in good condition, properly preserved, and within hold time for the requested analyses.

All laboratory analytical data presented herein was generated by a laboratory certified by the Nevada Division of Environmental Protection for each constituent and media reported for which a certification is required and offered.

Should you have any questions or comments, please feel free to contact me at (702) 321-8315.

General Comments:
None
Some Sample and/or QA results have been flagged as follows:
None

11/19/09

Bruce G. Cunningham
Veritas Laboratories
Nevada Lab ID NV00918

Date

Veritas Laboratories
Truth in Quality, Truth in Service

CLIENT COMPANY NAME: TRC Solutions
CLIENT PROJECT NAME: **GGP-Boulevard Mall**
CLIENT PROJECT NUMBER: 173006

CLIENT SAMPLE ID: **EMW2-1109**
DATE SAMPLED: 11/13/09
VERITAS SAMPLE ID: V0911030-01

METHOD: Volatile Organic Compounds by EPA 8260B, GC/MS
MATRIX: Groundwater
DATE(S) ANALYZED: 11/18/09

PARAMETER	RESULT µg/L	RL (PQL) µg/L	DF	PARAMETER	RESULT µg/L	RL (PQL) µg/L	DF
Benzene	ND	5.0	1	Ethylbenzene	ND	5.0	1
Bromobenzene	ND	5.0	1	Hexachlorobutadiene	ND	5.0	1
Bromodichloromethane	ND	5.0	1	Isopropylbenzene	ND	5.0	1
Bromoform	ND	5.0	1	4-Isopropyltoluene	ND	5.0	1
Bromomethane	ND	5.0	1	Methylene chloride (DCM)	ND	5.0	1
n-Butylbenzene	ND	5.0	1	Naphthalene	ND	5.0	1
sec-Butylbenzene	ND	5.0	1	n-Propylbenzene	ND	5.0	1
tert-Butylbenzene	ND	5.0	1	Styrene	ND	5.0	1
Carbon tetrachloride	ND	5.0	1	1,1,1,2-Tetrachloroethane	ND	5.0	1
Chlorobenzene	ND	5.0	1	1,1,2,2-Tetrachloroethane	ND	5.0	1
Chloroethane	ND	5.0	1	Tetrachloroethene (PCE)	ND	5.0	1
Chloroform	ND	5.0	1	Toluene	ND	5.0	1
Chloromethane	ND	5.0	1	1,2,3-Trichlorobenzene	ND	5.0	1
2-Chlorotoluene	ND	5.0	1	1,2,4-Trichlorobenzene	ND	5.0	1
4-Chlorotoluene	ND	5.0	1	1,1,1-Trichloroethane (1,1,1-TCA)	ND	5.0	1
1,2-Dibromo-3-chloropropane (DBCP)	ND	5.0	1	1,1,2-Trichloroethane (1,1,2-TCA)	ND	5.0	1
Dibromochloromethane	ND	5.0	1	Trichloroethene (TCE)	ND	5.0	1
1,2-Dibromoethane (EDB)	ND	5.0	1	Trichlorofluoromethane (Freon11)	ND	5.0	1
Dibromomethane	ND	5.0	1	1,2,3-Trichloropropane	ND	5.0	1
1,2-Dichlorobenzene (o-DCB)	ND	5.0	1	1,2,4-Trimethylbenzene	ND	5.0	1
1,3-Dichlorobenzene (m-DCB)	ND	5.0	1	1,3,5 -Trimethylbenzene	ND	5.0	1
1,4-Dichlorobenzene (p-DCB)	ND	5.0	1	Vinyl chloride	ND	5.0	1
Dichlorodifluoromethane (Freon 12)	ND	5.0	1	m,p-Xylene	ND	10	1
1,1-Dichloroethane (1,1-DCA)	ND	5.0	1	o-Xylene	ND	5.0	1
1,2-Dichloroethane (1,2-DCA)	ND	5.0	1	MTBE	ND	5.0	1
1,1-Dichloroethene (1,1-DCE)	ND	5.0	1				
cis-1,2-Dichloroethene	ND	5.0	1				
trans-1,2-Dichloroethene	ND	5.0	1				
1,2-Dichloropropane	ND	5.0	1				
1,3-Dichloropropane	ND	5.0	1				
2,2-Dichloropropane	ND	5.0	1				
1,1-Dichloropropene	ND	5.0	1				

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
Dibromofluoromethane	85	70-130%
1,2-Dichloroethane-d4	74	70-130%
Toluene-d8	90	70-130%
4-Bromofluorobenzene	95	70-130%

RL-Reporting Limit (Practical Quantitation Limit)
DF-Dilution Factor

ND - Not Detected at Indicated Reporting Limit (PQL).

Veritas Laboratories
Truth in Quality, Truth in Service

CLIENT COMPANY NAME: TRC Solutions
CLIENT PROJECT NAME: **GGP-Boulevard Mall**
CLIENT PROJECT NUMBER: 173006

CLIENT SAMPLE ID: **METHOD BLANK**
DATE SAMPLED: NA
VERITAS SAMPLE ID: VBLK091118-08

METHOD: Volatile Organic Compounds by EPA 8260B, GC/MS
MATRIX: Groundwater
DATE(S) ANALYZED: 11/18/09

PARAMETER	RESULT µg/L	RL (PQL) µg/L	DF	PARAMETER	RESULT µg/L	RL (PQL) µg/L	DF
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1,2-Dichlorobenzene (o-DCB)	ND	5.0	1	1,2,4-Trimethylbenzene	ND	5.0	1
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1,2-Dichloroethane (1,2-DCA)	ND	5.0	1	MTBE	ND	5.0	1
1,1-Dichloroethene (1,1-DCE)	ND	5.0	1				
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1,2-Dichloropropane	ND	5.0	1				
1,3-Dichloropropane	ND	5.0	1				
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Veritas Laboratories

Truth in Quality, Truth in Service

624-5 Harrison Drive, Suite 4, Las Vegas, NV 89120

(702) 521-8515 Phone
(702) 597-2098 Fax
Email: veritaslabs@msn.com

Veritas Lab Order ID: V0911030

Company: TRC Solutions	Telephone: (702) 295-6415
Address: 1009 Whitney Ranch Dr. Henderson NV 89014	Fax:
	Email: JYuan@TRCSolutions.com
Attention: Jo Wang	Project Name/Project Number: GGB - Boulder Hwy.
Invoice To: Jeff Lapeman	
Sampled By: GW	P.O. Number: 173006

Client Sample Identification	Veritas Sample Identification	Date Sampled	Time Sampled	Composite	Grab	Matrix Code[1]	8260B - Full Suite	Total # of Containers	Preservation Code[2]	Container Code[3]
GMW2-1109	V0911030-01	11/3/09	1205			GW	X	3	H	V

For Drinking Water Compliance Only: Sampler attests to authenticity and validity of information on this Chain of Custody _____ (initial). Falsification of information on this Chain of Custody may be considered fraud.

Comments

All Data Reported on a Wet-Weight Basis Unless Otherwise Specified

Relinquished by: (Signature)	Date/Time:
Edwin Wesley	11/5/09 1255
Received by: (Signature)	Date/Time:
B. Cig	11/5/09 1255
Relinquished by: (Signature)	Date/Time:
Received by: (Signature)	Date/Time:

Turnaround Time:

- ___ Same Day
- ___ 1 Day
- ___ 2 Days
- ___ 3 Days
- X 5 Days (Normal)
- ___ Other

11/10/09
Date Needed

[1]Matrix Code

GW=Groundwater
WW=Wastewater
DW=Drinking Water
S=Soil/Solid
SL=Sludge
OL=Organic Liquid
A=Air
W=Wipe
O=Other

[2]Preservation Code

I=Iced
H=HCL
N=HNO_3
S=H_2SO_4
X=NaOH
T=$Na_2S_2O_3$
Z=ZnAc
NO=None
O=Other

[3]Container Code

A=Amber
G=Glass
P=Plastic
ST=Sterile
V=VOA Vial
T=Tedlar Bag
W=Wipe
O=Other

For Lab Use Only

Received in Good Condition? (Yes) No

Custody Seals? Yes (No)

Temperature 19°C

By Signing this Chain of Custody, the Client Agrees to Veritas Laboratories' Published Standard Terms and Conditions

CHAIN OF CUSTODY